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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
JANUARY 29, 2020, 10:00 A.M. AND
1:30 P.M. OMNIBUS HEARINGS**

Date: January 29, 2020
Time: 10:00 a.m. and 1:30 p.m.¹ (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

¹ The Proposed Agenda for the 1:30 p.m. hearing begins on page 11.

PROPOSED AGENDA FOR
JANUARY 29, 2020, 10:00 A.M. (PACIFIC TIME)
OMNIBUS HEARING

I: MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

UNCONTESTED MATTERS GOING FORWARD

1. **Compromised First Interim Fee Applications:** *Notice of Hearing on First Interim Applications Allowing and Authorizing Payment of Fees and Expenses of Multiple Fee Applicants Based Upon Compromises with the Fee Examiner [Dkt. 5258].*

Response Deadline: January 22, 2020, at 4:00 p.m. (Pacific Time).

Related Documents:

- A. First Interim Fee Application of Weil, Gotshal & Manges LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period January 29, 2019 Through and Including April 30, 2019 [Dkt. 2988].
- B. First Interim Fee Application of KPMG LLP For Compensation for Services Rendered and Reimbursement of Expenses as Information Technology, Risk, and Legal Support Consultants to the Debtors for the Period from January 29, 2019 Through May 21, 2019 [Dkt. 2992].
- C. First Interim Application of Baker & Hostetler LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 15, 2019 Through May 31, 2019 [Dkt. 2995].
- D. First Interim Fee Application of Munger, Tolles & Olson LLP for Compensation for Services and Reimbursement of Expenses as Attorneys to the Debtors and Debtors in Possession for Certain Matters from January 29, 2019 Through May 31, 2019 [Dkt. 2996].
- E. First Interim Application of FTI Consulting, Inc. for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 12, 2019 Through May 31, 2019 [Dkt. 3137].
- F. First Interim Application of Jenner & Block LLP as Special Corporate Defense and Energy Counsel to the Debtors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from January 29, 2019 Through May 31, 2019 [Dkt. 3465].
- G. First Interim Fee Application of Cravath, Swaine & Moore LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period January 29, 2019 Through and Including May 31, 2019 [Dkt. 3683].
- H. First Interim Fee Application of Berman and Todderud LLP for Allowance and Payment of Compensation and Reimbursement of Expenses (February 1, 2019 Through May 31, 2019) [Dkt. 4383].

- I. First Interim Application of Lincoln Partners Advisors LLC Allowance and Payment of Compensation and Reimbursement of Expenses for the Period March 1, 2019 Through May 31, 2019 [Dkt. 4633].
- J. First Interim Application for Trident DMG LLC for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period from July 18, 2019 Through September 30, 2019 [Dkt. 4721].
- K. First and Final Application of Dundon Advisors LLC for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period March 1, 2019 Through August 31, 2019 [Dkt. 4727].
- L. First Interim Fee Application of Development Specialists, Inc. for Allowance and Payment of Compensation and Reimbursement of Expenses (March 20, 2019 Through July 31, 2019) [Dkt. 4731].
- M. Stipulated Amendment to First Interim Fee Application of Development Specialists, Inc. for Allowance and Payment of Compensation and Reimbursement of Expenses (March 20, 2019 Through July 31, 2019) [Dkt. 5295].
- N. Amended Notice of Hearing on First Interim Applications Allowing and Authorizing Payment of Fees and Expenses of Multiple Applicants Based Upon Compromises with the Fee Examiner [Dkt. 5307].

Related Orders:

- O. Amended Order Granting Fee Examiner's Motion to Approve Fee Procedures [Dkt. 5168].

Status: This matter is going forward on an uncontested basis.

CONTESTED MATTER GOING FORWARD

2. **Motion to Apply Bankruptcy Rule 7023** *Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* [Dkt. 5042].

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Stipulation Regarding Scheduling with Respect to Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim [Dkt. 5198].
- B. Debtors' Objection to Class Representative's Motion to Extend Application of Federal Rule of Civil Procedure 23 to Proof of Claim [Dkt. 5369].
- C. Declaration of Christina Pullo (I) Regarding Implementation of the Debtors' Notice Procedures And (II) in Support of the Debtors' Objection to Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Proof of Claim [Dkt. 5370].

- 1 D. Declaration of Benjamin P.D. Schrag (I) Regarding Implementation of the
2 Debtors' Notice Procedures And (II) in Support of the Debtors' Objection
3 to Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to
4 Proof of Claim [Dkt. 5371].
- 5 E. Declaration of Jeanne C. Finegan (I) Regarding Implementation of the
6 Debtors' Notice Procedures And (II) in Support of The Debtors' Objection
7 to Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to
8 Proof of Claim [Dkt. 5372].
- 9 F. Opposition of Official Committee of Tort Claimants' to Securities Lead
10 Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim
11 [Dkt. 5373].
- 12 G. Debtors' Request for Judicial Notice in Support of Debtors' Objection to
13 Class Representative's Motion to Extend Application of Federal Rule of
14 Civil Procedure 23 to Proof of Claim [Dkt. 5374].
- 15 H. Declaration of David J. Richardson in Support of Opposition of Official
16 Tort Claimants' to Security Lead Plaintiff's Motion to Apply Bankruptcy
17 Rule 7023 to Class Proof of Claim [Dkt. 5375].

18 Related Documents:

- 19 I. Securities Lead Plaintiff's Reply in Further Support of Motion to Apply
20 Bankruptcy Rule 7023 to Class Proof of Claim [Dkt. 5452].
- 21 J. Declaration of Adam D. Walter of A.B. Data, LTD. Regarding Standard
22 Procedures and Methods Utilized in Securities Class Action Notice
23 Programs [Dkt. 5456].
- 24 K. Declaration of Andrew D. Behlmann, Esq. in Support of Securities
25 Plaintiff's Reply in Further Support of Motion to Apply Bankruptcy Rule
26 7023 to Class Proof of Claim [Dkt. 5458].

27 Status: This matter is going forward on a contested basis.

28 **STATUS CONFERENCE**

3. **Notice of Filing of Joint Chapter 11 Plan:** *Notice of Filing of Debtors' and
Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated December 12, 2019*
[Dkt. 5102].

- A. Joint Chapter 11 Plan of Reorganization of Official Committee of Tort
Claimants and Ad Hoc Committee of Senior Unsecured Noteholders
[Dkt. 4257].
- B. Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of
Reorganization Dated December 12, 2019 [Dkt. 5101].
- C. Statement of the United States of America in Response to the Court's
Memorandum Regarding Confirmation Issues [Dkt. 5087].

- D. Statement of the California State Agencies in Response to the Court's Memorandum Regarding Confirmation Issues [**Dkt. 5104**].
- E. Stipulation Amending Order Establishing Preconfirmation Briefing and Hearing Schedule for Certain Legal Issues [**Dkt. 5254**].
- F. Valley Clean Energy Alliance's Status Conference Statement Regarding Preconfirmation Legal Issues [**Dkt. 5442**].
- G. Joinder of South San Joaquin Irrigation District to Valley Clean Energy Alliance Status Conference Statement Regarding Preconfirmation Legal Issues [**Dkt. 5446**].
- H. Partial Joinder of the City and County of San Francisco to the Status Conference Statement of Valley Clean Energy Alliance Regarding Preconfirmation Issues [**Dkt. 5468**].
- I. Letter to Court from Ad Hoc Committee of Holders of Trade Claims re: PPI Decision [**Dkt. 5517**].

Related Order:

- J. Order Approving Stipulation Amending Order Establishing Preconfirmation Briefing and Hearing Schedule for Certain Legal Issues [**Dkt. 5312**].
- K. Further Memorandum Regarding Confirmation Issues [**Dkt. 5389**].

Status: This matter is going forward.

RESOLVED AND CONTINUED MATTERS

4. **Subrogation Claims Impairment Issue:** *Order Establishing Pre-Confirmation Briefing and Hearing Schedule for Certain Legal Issues* [**Dkt. 4540**].

Response Deadline: December 20, 2019

Responses Filed:

- A. Debtors' and Ad Hoc Subrogation Group's Joint Brief in Support of the Subrogation Wildfire Claims as Impaired Classes for All Purposes Under the Debtors' Joint Chapter 11 Plan of Reorganization [**Dkt. 4886**].

Related Documents:

- B. Reservation of Rights of the Ad Hoc Committee of Senior Unsecured Noteholders with Respect to Subrogation Claims Impairment Issue [**Dkt. 4893**].
- C. Statement and Reservation of Rights of the Official Committee of Unsecured Creditors Regarding Subrogation Claim Impairment Issue [**Dkt. 4897**].

D. Response and Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' and Ad Hoc Subrogation Group's Joint Brief in Support of the Subrogation Wildfire Claims as Impaired Classes for All Purposes Under the Debtors' Joint Chapter 11 Plan of Reorganization [Dkt. 5342].

Status: This matter has been continued to February 11, 2020 [Dkt. 5474].

5. **Ad Hoc Committee Motion for Reconsideration and Relief from TCC and Subrogation RSA Orders:** *Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b)* [Dkt. 5241].

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Joinder of William B. Abrams to Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [Dkt. 5353].
- B. Debtors' Objection to Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [Dkt. 5365].
- C. Objection of the Ad Hoc Group of Subrogation Claim Holders to the Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [Dkt. 5366].
- D. Objection of Certain PG&E Shareholders to Motion of the Ad Hoc Committee of Unsecured Noteholders for Reconsideration of Orders Approving TCC and Subrogation Claimant RSAS; Joinder in Debtors' Objection [Dkt. 5367].
- E. Joinder of the Baupost Group, L.L.C. in the Ad Hoc Group of Subrogation Claim Holders' Objection to the Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [Dkt. 5376].

Related Orders:

- F. Order Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Authorizing the Debtors to Enter into Restructuring Support Agreement with the Consenting Subrogation Claimholders, (II) Approving the Terms of Settlement with Such Consenting Subrogation Claimholders, Including the Allowed Subrogation Claim Amount, and (III) Granting Related Relief [Dkt. 5173].
- G. Order Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5174].

Status: This matter was continued [Dkt. 5473] and taken off the calendar by January 23, 2020 Docket Text Order.

6. **Claimant Cara Feneis' Motion for Relief from Automatic Stay:** *Cara Feneis' Notice of Hearing on Motion for Relief from the Automatic Stay [Dkt. 5207].*

Response Deadline: No response deadline was provided,

Response Filed:

A. Stipulation Between Debtor Pacific Gas and Electric Company and Movant Cara Feneis for Limited Relief from the Automatic Stay [Dkt. 5410].

Related Documents:

B. Relief from Stay Cover Sheet [Dkt. 5207-2].

C. Declaration of Yosef Peretz in Support of Cara Feneis' Motion for Relief from the Automatic Stay [Dkt. 5207-3].

D. Cara Feneis' Request for Judicial Notice in Support of Her Motion for Relief from the Automatic Stay [Dkt. 5207-4].

Related Order:

E. Order Approving Stipulation Between Debtor Pacific Gas and Electric Company and Movant Cara Feneis for Limited Relief from the Automatic Stay [Dkt. 5440].

Status: This matter has been resolved by stipulation [Dkt. 5410] and taken off calendar by January 22, 2020 Docket Text Order.

7. **Debtors' 503(b)(9) Motion:** *Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt. 2896].*

Response Deadline: July 31, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

A. Response in Opposition to Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt. 3263].

B. Response of C.H. Reynolds Electric, Inc. to Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt. 3267].

C. Opposition of Shiloh IV Lessee, LLC to Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt. 3284].

D. Opposition of Marsh Landing, LLC to Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt. 3286].

- 1 E. Proposed Document Filed Under Seal [**Dkt. 3287**].
- 2 F. Response of Claimant Global Ampersand LLC to Objection of Debtors to
- 3 Claim Asserted by Claimant Pursuant to 11 U.S.C. § 503(b)(9) [**Dkt.**
- 4 **3288**].
- 5 G. Response of Surf to Snow Environmental Resource Management, Inc. to
- 6 Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant
- 7 to 11 U.S.C. § 503(b)(9) [**Dkt. 3302**].
- 8 H. Omnibus Stipulation Between Debtors and Certain Claimants Extending
- 9 Time to Respond to Debtors' First Omnibus Report and Objection to
- 10 Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [**Dkt. 3306**].
- 11 I. Response of U.S. Telepacific Corp. DBA TPX Communications to
- 12 Debtors' First Omnibus Report and Objection to Claims Asserted Pursuant
- 13 to 11 U.S.C. § 503(b)(9) [**Dkt. 3313**].
- 14 J. Letter to Court from Hypower, Inc. Regarding Debtors' First Omnibus
- 15 Report and Objection to Claims Asserted Pursuant to 11 U.S.C. §
- 16 503(b)(9) [**Dkt. 3315**].
- 17 K. Exhibit A of Response of C.H. Reynolds Electric, Inc. to Debtors' First
- 18 Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C.
- 19 § 503(b)(9) [**Dkt. 3324**].

20 Related Documents:

- 21 L. Declaration of Robb C. McWilliams in Support of Debtors' First Omnibus
- 22 Report and Objection to Claims Asserted Pursuant to 11 U.S.C. §
- 23 503(b)(9) [**Dkt. 2897**].
- 24 M. Notice of Filing of Revised Proposed Order Approving Debtors' First
- 25 Omnibus Report and Objection to Claims Asserted Pursuant to 11 U.S.C.
- 26 § 503(b)(9) [**Dkt. 3522**].

27 Related Orders:

- 28 N. Order Granting Omnibus Stipulation Between Debtors and Certain
- Claimants Extending Time to Respond to Debtors' First Omnibus Report
- and Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [**Dkt.**
- 3365**].
- O. Order Granting Debtors' First Omnibus Report and Objection to Claims
- Asserted Pursuant to 11 U.S.C. § 503(b)(9) [**Dkt. 3564**].

Status: The claims of Shiloh IV Lessee, LLC and Marsh Landing, LLC have been continued to February 26, 2020. All other Responding 503(b)(9) Claims have been continued to March 25, 2020.

8. **Make-Whole Premium Briefing:** *Debtors' Brief Regarding Utility Funded Debt Claims' Entitlement to Make-Whole Premiums and Joinder of PG&E Shareholders* [**Dkt. 4896**].

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 4902**].
- B. Declaration of Andrew I. Silfen in Support of Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 4903**].
- C. Consolidated Opposition Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 5189**].
- D. Letter to the Court from Andrew I. Silfen Regarding Optional Redemption/Make-Whole Oral Argument [**Dkt. 5430**].

Related Documents:

- E. Declaration of Theodore E. Tsekerides, Esq. in Support of Debtors' Moving Brief Regarding Utility Funded Debt Claims' Entitlement to Make-Whole Premiums [**Dkt. 4898**].
- F. Debtors' Opposition to the Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case; Joinder of PG&E Shareholders [**Dkt. 5190**].

Status: This matter has been continued without a further hearing date [**Dkt. 5514**] and dropped from the calendar by January 27 Docket Text Order.

9. **Exit Financing Motion:** *Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims* [**Dkt. 4446**].

Response Deadline: January 22, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Letter from the Official Committee of Unsecured Creditors to the Honorable Dennis Montali Regarding Exit Financing Discovery [**Dkt. 4562**].
- B. Letter from the Ad Hoc Committee of Senior Unsecured Noteholders to the Honorable Dennis Montali in Regards to November 4, 2019 Letter from Creditors' Committee [**Dkt. 4566**].
- C. Letter from the Official Committee of Tort Claimants to the Honorable Dennis Montali Regarding Exit Financing Discovery [**Dkt. 4575**].

- 1 D. Letter from the Debtors to the Honorable Dennis Montali in Response to
2 Letters Filed by Requesting Parties [**Dkt. 4577**].
- 3 E. Letter Regarding Continuance of the December 17, 2019 Hearing on the
4 Debtors' Motion for Entry of Orders (I) Approving Terms of, and
5 Debtors' Entry Into and Performance Under, Exit Financing Commitment
6 Letters and (II) Authorizing Incurrence, Payment, and Allowance of
7 Related Fees and/or Premiums, Indemnities, Costs and Expenses as
8 Administrative Expense Claims (the Motion) and Extension of Time to
9 Respond to that Motion [**Dkt. 4968**].
- 10 F. Letter Joining the Official Committee of Unsecured Creditors Request for
11 a Continuance of the December 17, 2019 Hearing on the Debtors' Motion
12 for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and
13 Performance Under, Exit Financing Commitment Letters and (II)
14 Authorizing Incurrence, Payment, and Allowance of Related Fees and/or
15 Premiums, Indemnities, Costs and Expenses as Administrative Expense
16 Claims (the Motion) and Extension of Time to Respond to that Motion
17 [**Dkt. 4970**].
- 18 G. Letter Brief of the TCC to the Honorable Dennis Montali [**Dkt. 4971**].
- 19 H. Objection of Governor Gavin Newsom to Debtors' Amended Motion for
20 Entry of Orders (I) Approving Terms of, and Debtors' Entry into and
21 Performance Under, Equity Backstop Commitment Letters, (II) Approving
22 Terms of, and Debtors' Entry Into and Performance Under, Debt
23 Financing Commitment Letters and (III) Authorizing Incurrence, Payment
24 and Allowance of Related Fees and/or Premiums, Indemnities, Costs and
25 Expenses as Administrative Expense Claims [**Dkt. 5445**].
- 26 I. Opposition by TURN to Debtors' Amended Motion for Entry of Orders (I)
27 Approving Terms of, and Debtors' Entry into and Performance Under,
28 Exit Financing Commitment Letters and (II) Authorizing Incurrence,
Payment and Allowance of Related Fee and/or Premiums, Indemnities,
Costs and Expenses as Administrative Expense Claims [**Dkt. 5451**].

Related Documents:

- 20 J. Declaration of Kenneth S. Ziman in Support of Debtors' Motion for Entry
21 of Orders (I) Approving Terms of, and Debtors' Entry into and
22 Performance Under, Exit Financing Commitment Letters and (II)
23 Authorizing Incurrence, Payment and Allowance of Related Fees and/or
24 Premiums, Indemnities, Costs and Expenses as Administrative Expense
25 Claims [**Dkt. 4447**].
- 26 K. Debtors' Amended Motion for Entry of Orders (I) Approving Terms of,
27 and Debtors' Entry Into and Performance Under, Equity Backstop
28 Commitment Letters, (II) Approving Terms of, and Debtors' Entry Into
and Performance Under, Debt Financing Commitment Letters and (III)
Authorizing Incurrence, Payment and Allowance of Related Fees and/or

Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [Dkt. 5267].

- L. Declaration of Kenneth S. Ziman in Support of Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry Into and Performance Under, Debt Financing Commitment Letters and (III) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [Dkt. 5268].

Status: This matter has been continued to February 19, 2020 at 10:00 a.m. (Pacific Time) [Dkt. 5516].

**PROPOSED AGENDA FOR
JANUARY 29, 2020, 1:30 P.M. (PACIFIC TIME)
OMNIBUS HEARING**

I: MATTER SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

1. **Tubbs Settlement Motion:** *Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief [Dkt. 5282].*

Response Deadline: January 17, 2020, at 12:00 p.m. (Pacific Time).

Responses Filed:

- A. Objection to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief; and Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 for Entry of an Order Authorizing Redaction and Sealing of Confidential Information from Tubbs Settlement Documents [Dkt. Nos. 5282 and 5284] [Dkt. 5459].
- B. Joinder by Baum Hedlund Aristei Goldman Camp Fire Victims Clients in the Objection to Debtors' Motions [Dkt. No. 5282] and [Dkt. No. 5284] Filed by Claimants Elizabeth Adams, Mary Adams, and David Agostino, et al. [Dkt. No. 5459] [Dkt. 5472].
- C. Response to Objection to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief; and Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 for Entry of an Order Authorizing Redaction and Sealing of Confidential Information from Tubbs Settlement Documents [Dkt. 5497].
- D. Declaration of Frank M. Pitre in Support of Response to Objection to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors

1 to Settle the Claims of Tubbs Preference Claimants and (II) Granting
2 Related Relief; and Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and
3 107(b) and Fed. R. Bankr. P. 9018 for Entry of an Order Authorizing
Redaction and Sealing of Confidential Information from Tubbs Settlement
Documents [**Dkt. 5498**].

4 E. Joinder of Certain Tubbs Preference Plaintiffs [Singleton] in Support of
5 Response to Objections to Terms of Tubbs Settlement Documents
[**Dkt. 5500**].

6 F. Joinder of Certain Tubbs Preference Plaintiffs [Corey] in Support of
7 Response to Objections to Terms of Tubbs Settlement Documents
[**Dkt. 5501**].

8 G. Declaration [Dario de Ghetaldi] in Support of Joinder of Certain Tubbs
9 Preference Plaintiffs in Support of Response to Objections to Terms of
Tubbs Settlement Documents [**Dkt. 5502**].

10 H. Joinder of Certain Tubbs Preference Plaintiffs [Robins] in Support of
11 Response to Objections to Terms of Tubbs Settlement Documents
[**Dkt. 5503**].

12 I. Declaration [Robert T. Bryson] in Support of Joinder of Certain Tubbs
13 Preference Plaintiffs in Support of Response to Objections to Terms of
Tubbs Settlement Documents [**Dkt. 5504**].

14 Related Documents:

15 J. Declaration of Janet Loduca in Support of Debtors' Motion Pursuant to 11
16 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for
Entry of an Order (I) Authorizing the Debtors to Settle the Claims of
17 Tubbs Preference Claimants and (II) Granting Related Relief [**Dkt. 5283**].

18 K. Proposed Redacted Document [**Dkt. 5285**].

19 L. Request for Entry of Order by Default Granting Debtors' Motion Pursuant
20 to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 909 for
Entry of an Order (I) Authorizing the Debtors to Settle the Claims of
Tubbs Preference Claimants and (II) Granting Related Relief [**Dkt. 5444**].

21 M. Debtors' Reply to the Objecting Camp Fire Claimants' Objection to the
22 Tubbs Settlement Motion [Dkt. 5459] and the Additional Objecting Camp
Fire Claimants' Joinder [Dkt. 5472] [**Dkt. 5485**].

Related Orders:

- N. Order Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 for Entry of an Order Authorizing Redaction and Sealing of Confidential Information from Tubbs Settlement Documents [**Dkt. 5301**].
- O. Order Granting *Ex Parte* Motion of Debtors Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief [**Dkt. 5292**].

Status: This matter is going forward on a contested basis.

PLEASE TAKE NOTICE that copies of any pleadings filed with the Court and referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: January 28, 2020

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